

***Remarks***

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-22 are pending in the application, with claims 1, 7, 9, 15, and 16 as being the independent claims. No claims are sought to be cancelled. New claims 18-22 are sought to be added. These new claims introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

***Rejections under 35 U.S.C. § 102***

Claims 1-17 have been rejected under 35 U.S.C. 102(e) as being anticipated by Published U.S. Patent Application No: 2001/0054074, entitled *Electronic Mail System and Device*, filed by Kiyoko Hayashi on March 8, 2001 ("Hayashi Patent Application"). Applicants respectfully traverse this rejection. Based on the remarks set forth below, Applicants respectfully request that this rejection be reconsidered and withdrawn.

In Applicant's Office Action response, dated March 10, 2005, Applicants explicitly stated that Applicants did not acquiesce that the priority date of the Hayashi Patent Application precedes the date of invention of the present invention. Applicants, while unnecessary, reserved the right to establish that the Hayashi Patent Application may not be prior art.

Applicants hereby submit a declaration under 37 C.F.R. 1.131 by the inventors, declaring that the data of invention is prior to March 8, 2001. Having demonstrated a

date of invention prior to March 8, 2001, Applicants respectfully submit that the Hayashi Patent Application does not qualify as a valid reference under 35 U.S.C. § 102.

Therefore, Applicant respectfully submits that claims 1-17 are patentable over the Hayashi Patent Application. Reconsideration and withdrawal of the rejections of claims 1-17 is respectfully requested.

Notwithstanding the above showing that the Hayashi Patent Application does not qualify as a valid reference, Applicants respectfully disagree with the Examiner's conclusion that arguments presented in the Applicants' Office Action response, dated March 10, 2005 did not overcome the Examiner's rejections based on the Hayashi Patent Application. The Examiner commented that the claim's language does not require that storages of servers for serving or storing media content and non-media content, must be physically separated from each other. The Examiner indicated that since the claim language does not require physical separation, therefore it has not been considered. Examiner further states that Examiner believes that nowadays or at the time of the invention, Applicants must be made aware of a single piece of computer hardware could be divided to multiple of logical servers or storage devices. Applicants do not acquiesce to Examiner's statement, however, Applicants note that FIG. 1 identified physically separated storage devices and servers. Applicants have added new dependent claims 18-22 to specifically identify the situation when there is physical separation between devices (e.g., mass storage device 110 and email server 105 are different devices that are physically separated). These amendments introduce no new matter, as evidenced at least by reference to FIG. 1.

Applicants respectfully submit that claims 18-22 are patentable over the Hayashi Patent Application for at least the reasons stated above. Additionally, claims 18-22 are

patentable over the Hayashi Patent Application for the reasons presented in Applicants' Office Action response dated March 10, 2005. Allowance of claims 18-22 are respectfully requested.

***Conclusion***

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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